

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

OPENTV, INC.,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

C.A. No. 12-1733 (GMS)

**DECLARATION OF MATTHEW TOPIC IN SUPPORT OF OPENTV, INC.'S  
ANSWERING BRIEF IN OPPOSITION TO NETFLIX'S MOTION TO TRANSFER**

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*Attorneys for OpenTV, Inc.*

June 20, 2013

I, Matthew Topic, declare as follows:

1. I am an attorney at Kirkland & Ellis LLP, counsel for Plaintiff OpenTV, Inc. in this litigation. I have personal knowledge of the facts set forth herein and, if called as a witness, would be competent to testify thereto.

2. Based on the results of a search of public records performed under my direction, the last known residences of the named inventors of the patents asserted in this litigation, excluding current employees, and the distances in miles between their current addresses and the District of Delaware courthouse and the Northern District of California courthouse in San Jose calculated using the Google Maps Distance Measurement Tool are as follows:

<b>Inventor</b>	<b>Current Address</b>	<b>D. Del.</b>	<b>N.D. Cal.</b>
Abato, Michael	25 Cushman Rd. White Plains, NY 10606	128	2560
Alao, Rachad	3940 Ch De La Cote Des Neiges Montreal, Quebec, H3H1W2	410	2528
Duda, Carl	340 E. 80th St., Apt. 18J New York, NY 10075	110	2554
Dureau, Vincent	301 Main St., Unit 12B San Francisco, CA 94105	2501	42
Harrington, Jeffrey	1622 Periwinkle Way Sanibel, FL 33957	994	2437
Hausman, Kevin	1105 Manchester Ct. Naperville, IL 60563	677	1811
Henrard, Jose	14 Rue de Liege, F-75005 Paris, France	3735	5577
Hidary, Jack	24 Central Park South, Apt 6E New York, NY 10019	109	2553
Huntington, Matthew	23 Gordon Ave. Twickenham, Great Britain	3563	5367
Lam, Waiman	319 239th Court Southeast Sammamish, WA 98074	2351	711
Sardera, Esteban	448 Sunnyslope Ave. Oakland, CA 94610	2493	39
Spivack, Nova	4111 Colbath Ave. Sherman Oaks, CA 91423	2379	293
Su, Dongmin	2038 Finley Pl., #135 Santa Clara, CA 95050	2488	5

Ullman, Craig	112 Willow Street, Apt 4A Brooklyn, NY 11201	105	2553
Whitledge, James	30W 345 Bruce Ln. Naperville, IL 60563	677	1811
Wolzien, Thomas	91 River Rd. Nyack, NY 10960	125	2552

3. Based on the results of a search of public records performed under my direction, the last known residences of the inventors listed on European Patent Application EP 2268026 A2 (attached as Exhibit K to the declaration of Laura Miller) are as follows:

Mckissick, Pamela	19801 S. Sheridan Rd. Mounds, OK 74047
Thomas, William	12 Broad Leaf Trail Malvern, PA 19355
Ellis, Michael	1715 Columbine Ave. Boulder, CO 80302
Regouby, Mark	1410 Tranquilla Dr. Dallas, TX 75218
Hassell, Joel	5782 Secrest Ct. Golden, CO 80403

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on June 20, 2013, in Chicago, Illinois.



Matthew Topic

**CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 2013, I caused to be served by electronic mail and hand delivery copies of the foregoing document and electronically filed the same with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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I further certify that on June 20, 2013, I caused to be served by electronic mail copies of the foregoing document upon the following counsel of record:

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